UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 0 6 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7648 7061
RETURN RECEIPT REQUESTED

Mr. Don Wilson, Junior
Building Maintenance Supervisor
Hawker Beechcraft Services, Incorporated
Indianapolis International Airport
6911 West Pierson Drive
Indianapolis, Indiana 46251

Re: Notice of Violation
Compliance Evaluation Inspection
INR000127159

Dear Mr. Wilson:

On August 6, 2015 a representative of the U.S. Environmental Protection Agency and a representative of the Indiana Department of Environmental Management (IDEM) inspected the Hawker Beechcraft Services, Incorporated, facility located in Indianapolis, Indiana (HBS). As a large quantity generator of hazardous waste, HBS is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by HBS, EPA's review of records pertaining to HBS and the EPA inspector's observations, EPA has determined that HBS has unlawfully stored hazardous waste without a permit or interim status as a result of the failure of HBS to comply with certain conditions for a permit exemption under 329 Indiana Administrative Code 3.1-1-7 and 40 Code of Federal Regulations § 262.34(a)-(c). EPA has identified the permit exemption conditions and other regulations with which HBS was out of compliance at the time of the inspection in paragraphs 1- 12, below.

- Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from 329 IAC 3.1-1-7 and 40 CFR § 262.34(a)-(c), the generator:

(a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement.

- The exemption conditions identified in paragraphs 2 and 8 - 10 below are also independent TSD requirements incorporated from 329 IAC 3.1-1-7 and 329 IAC 3.1-10-1, and 40 CFR §§ 262.34 and 265. Accordingly, each failure of HBS to comply with these conditions is also a violation of the corresponding requirement in 329 IAC 3.1-1-7 and 329 IAC 3.1-10-1, and 40 CFR §§ 262.34 and 265.

EPA also determined that HBS violated RCRA requirements related to universal waste, as described in paragraphs 11 and 12, below.

Finally, EPA has two concerns for HBS to address, below.

Please note that all picture citations refer to the enclosed inspection report.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS

At the time of the inspection, HBS was out of compliance with the following large quantity generator permit exemption conditions:

1. Hazardous Waste Accumulation:
   Under 329 IAC 3.1-1-7 and 40 C.F.R. § 262.34(a), a large quantity generator may accumulate hazardous waste on-site for 90 days or less without a permit or interim status unless the generator has been granted an extension of the 90-day period.

   At the time of the inspection, HBS stored one 55-gallon drum container of Paint Waste D001 Ignitability / F005 Spent Solvent(s) hazardous waste in its Main Building less-than-90-day hazardous waste storage area with an accumulation date greater than 90 days, and was not granted an extension of the 90-day period (Picture 13).

2. Written Hazardous Waste Tank Assessment:
   Under 329 IAC 3.1-1-7 and 329 IAC 3.1-10-1, and 40 CFR §§ 262.34(a)(1)(ii) and 265.192(a), a large quantity generator that owns or operates a new hazardous waste tank system must obtain a written assessment, reviewed and certified by an independent registered Professional Engineer, attesting that the system has sufficient structural integrity and is acceptable for storing hazardous waste.

   At the time of the inspection, HBS did not have a written hazardous waste tank assessment for its pit in Hangar Building 137 that was being used as a hazardous waste tank containing D007 hazardous waste (Pictures 22 and 23).

3. Accumulation Start Date Requirement:
   Under 329 IAC 3.1-1-7 and 40 CFR § 262.34(a)(2), a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, HBS stored seven 55-gallon containers in its Main Building less-than- 90-day hazardous waste storage area containing D001 Ignitability and other characteristic hazardous wastes that were not marked with the date upon which each period of accumulation of hazardous waste began, and one additional container was marked with an incomplete date of, "2-5" (Picture 13).

At the time of the inspection, HBS stored a tote in Hangar Building 137 containing D007 Chromium hazardous waste holding over 55 gallons of hazardous waste that was not marked with the date upon which the period of accumulation of hazardous waste began (Pictures 20, 21 and 23).

At the time of the inspection, HBS used a pit in Hangar Building 137 as a hazardous waste storage tank containing over 40 gallons of D007 Chromium hazardous waste that was not marked with the date upon which the period of accumulation of hazardous waste began (Pictures 22 and 23).

4. Hazardous Waste Container and Tank Labeling Requirement:
Under 329 IAC 3.1-1-7 and 40 C.F.R. § 262.34(a)(3), a large quantity generator must clearly mark each container holding hazardous waste with the words, "Hazardous Waste".

   At the time of the inspection, HBS stored one 55-gallon container in Hangar Building 137 containing D007 Chromium hazardous waste that was not marked or labeled with the words, "Hazardous Waste" (Picture 25).

   At the time of the inspection, HBS used a pit in Hangar Building 137 as a hazardous waste storage tank containing over 40 gallons of D007 Chromium hazardous waste that was not marked or labeled with the words, "Hazardous Waste" at or near the tank (Pictures 22 and 23).

5. Hazardous Waste Satellite Container Accumulation Start Date Requirement:
Under 329 IAC 3.1-1-7 and 40 CFR § 262.34(c)(2), a large quantity generator must mark the container holding excess accumulation of hazardous waste with the date the excess amount began accumulating.

   At the time of the inspection, HBS stored one yellow 55-gallon satellite container with a hazardous waste label holding D001 Ignitability hazardous waste in Hangar Building 137 that was overfull without the date the excess amount began accumulating marked on the container (Picture 26).

   At the time of the inspection, HBS stored one black 55-gallon satellite container with a hazardous waste label and the words, "Paint Chips", holding D001 Ignitability hazardous waste in Hangar Building 137 that was overfull without the date the excess amount began accumulating marked on the container (Pictures 26 and 27).

6. Hazardous Waste Satellite Container at Point of Generation:
Under 329 IAC 3.1-1-7 and 40 CFR § 262.34(c)(1), a large quantity generator may accumulate up to 55 gallons of hazardous waste at or near the point of generation.

At the time of the inspection, HBS stored one 55-gallon satellite container of D001 Ignitability hazardous waste in the Main Building Riser Room at the machine used to crush the contents of the container (Picture 14), rather than at the point of generation.

7. Hazardous Waste Satellite Container, Marking or Labeling:
Under 329 IAC 3.1-1-7 and 40 CFR § 262.34(c)(1)(ii), a large quantity generator who accumulates up to 55 gallons of hazardous waste at or near the point of generation must mark the containers either with the words, "Hazardous Waste", or with other words that identify the contents of the containers.

At the time of the inspection, at two separate satellite accumulation areas in the Main Building Hangar, HBS stored two 55-gallon satellite containers (one at each satellite container area) holding D001 Ignitability hazardous waste that had incorrect descriptions of the actual contents of the container (i.e., HBS used the wrong description to identify the contents of the containers) (Picture 16).

8. Maintenance and Operation of the Facility Requirement:
Under 329 IAC 3.1-1-7 and 329 IAC 3.1-10-1, and 40 CFR §§ 262.34(a)(4) and 265.31, a large quantity generator must maintain and operate its facility in order to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

At the time of the inspection, HBS had dust from D007 Chromium hazardous waste or its constituents on the floor of Hangar Building 137 (Pictures 19, 24, and 29).

At the time of the inspection, HBS had a container of hazardous waste in Hangar Building 137 that was purposely not closed in order to allow venting into the air because the container, according to facility representatives, had the potential to generate gas and explode if closed (Picture 27), without any indication (label or markings on the container) that the material in the container had an explosive potential. *[Note: The label on the container in question was marked with the words "Hazardous Waste, Solid, N.O.S., 9, PGIII (Chromium), (D007)", and did not indicate that there was any material in the container that would lead to an explosion. Please provide in your response to this NOV: 1) an explanation of the explosive potential of the material in the container, 2) An average volatile organic (VO) concentration determination conducted in accordance with 40 CFR 265.1084 for the material in the container, and 3) a determination of whether or not the volatile emission(s) could be captured with an appropriate filter system.]*

At the time of the inspection, HBS was dismantling a hazardous waste storage tank in Hangar Building 137 (Picture 24). This tank was open, and the inside was still coated with D007 Chromium hazardous waste.

9. Training, Written Duties and Responsibilities Requirement:
Under 329 IAC 3.1-1-7 and 329 IAC 3.1-10-1, and 40 CFR §§ 262.34(a)(4) and 265.16(d), a large quantity generator must maintain the following documents and records at its facility:

   1) A written job description for each position at the facility related to hazardous waste management;

   2) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

   3) Records that document the training.

   At the time of the inspection, HBS did not have and was unable to provide in response to a request a written description for the Attendant Line Service position related to hazardous waste management at the facility.

   At the time of the inspection, HBS did not have and was unable to provide in response to a request a written description of the type and amount of introductory and continuing training HBS given to employees with duties related to hazardous waste management for the Attendant Line Service and Building Maintenance positions.

   At the time of the inspection, HBS did not have and was unable to provide in response to a request records that documented the training.

10. Contingency Plan, Written Emergency Equipment List Requirement:
Under 329 IAC 3.1-1-7 and 329 IAC 3.1-10-1, and 40 CFR §§ 262.34(a)(4) and 265.52(e), a large quantity generator must develop a contingency plan that includes a list of all emergency equipment at the facility that includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

    At the time of the inspection, HBS did not have and was unable to provide in response to a request an equipment list that included a list of all emergency equipment at the facility that includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

By failing to comply with the conditions for a permit exemption, above, HBS became an operator of a hazardous waste storage facility, and was required to obtain an Indiana hazardous waste storage permit. HBS failed to apply for such a permit. The failure of HBS to apply for and obtain a hazardous waste storage permit violated the requirements of 329 IAC 3.1-1-7 and 329 IAC 3.1-13-3(a) and (d), and 40 CFR §§ 270.1(c) and 270.10(a) and (d). Any failure to comply with a permit exemption condition incorporated from 329 IAC 3.1-1-7 and 40 CFR § 262.34, is also an independent violation of the corresponding TSD requirement.

At this time, EPA is not requiring HBS to apply for an Indiana hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1 - 10, above.

OTHER VIOLATIONS

At the time of the inspection, HBS was out of compliance with the following RCRA requirements:

11. Universal Waste Requirement:
    Under 329 IAC 3.1-16-2 and 40 C.F.R. § 273.13(d)(1), a small quantity handler of universal waste must contain any lamp in containers or packages. Such containers and packages must remain closed.

    HBS is a small quantity handler of universal waste because it accumulates less than 5,000 kilograms of universal waste at any time.

    At the time of the inspection, HBS had three containers of lamps that were not closed in the universal waste storage area (Picture 2).

12. Universal Waste Requirement:
    Under 329 I.A.C. 3.1-16-1 and 40 C.F.R. § 273.15(a), a small quantity handler of universal waste may accumulate universal waste for no longer than one year.

    At the time of the inspection, HBS stored one container of universal waste batteries marked with the date, "11/2013," which indicated storage for over one year. In addition, the accumulation date was an incomplete date (container within Picture 2).

Concerns

EPA also has two concerns to bring to your attention:

a. Accumulation Start Dates and the Hazardous Waste Labels:
   At the time of the inspection, HBS was using a two-number date system marked in the accumulation start date line of the hazardous waste labels. This is an incomplete accumulation start date. The accumulation start date must indicate the month, day and year accumulation begins.

b. Removal of the Hazardous Waste Storage Tank:
   HBS is removing a hazardous waste storage tank without notifying IDEM. EPA recommends that HBS notify IDEM about the closure of the hazardous waste storage tank.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us

no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions, including the universal waste requirements. You should submit your response to Daniel Chachakis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Daniel Chachakis, of my staff, at (312) 886-9871 or at chachakis.daniel@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Nancy Johnson, IDEM, njohnson@idem.in.gov
Jessica Wilkes, IDEM, jwilkes1@idem.in.gov

U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	Hawker Beechcraft Services, Incorporated
EPA ID NUMBER:	INR000127159
ADDRESS:	6911 Pierson Drive Indianapolis, Indiana 46241
DATE OF INSPECTION:	August 6, 2015
EPA INSPECTOR:	Daniel Chachakis Environmental Protection Specialist

PREPARED BY:

Daniel Chachakis, EPS — Date 08/31/2015
Compliance Section 1

APPROVED BY:

Michael Cunningham, Chief — Date 8/31/15
Compliance Section 1

Purpose of Inspection: This inspection was an evaluation of the Hawker Beechcraft Services, Incorporated's (HBS) compliance with hazardous waste, used oil, and universal waste regulations found at the Indiana Administrative Code (IAC) and the Code of Federal Regulations (CFR). I performed the inspection with Jessica Wilkes of the Indiana Department of Environmental Management (IDEM). The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as large quantity generator (LQG).

Participants

Inspector(s):

Daniel Chachakis, EPS, EPA
Jessica Wilkes, Inspector, IDEM

Site Representative(s):

Nate Davis, Line Service
Don Wilson, Building Maintenance

Introduction: On August 6, 2015, the inspectors arrived at the site at approximately 8:00 AM. We introduced ourselves and presented our inspector credentials to the front office receptionist. We were introduced to Mr. Davis, and we moved to a conference room. We were joined by Mr. Wilson. We again introduced ourselves and presented our inspector credentials and business cards, and described the purpose and process by which we intended to conduct the inspection. Mr. Davis and Mr. Wilson provided us with a description of the site operations. Mr. Wilson led the tour and provided us with the records we requested for review.

I provided a Small Business Resources information sheet and the IDEM Pollution Prevention, Programs and Services brochure to Mr. Wilson. We discussed for the site tour the following safety equipment was recommended or required: safety glasses, steel-toed boots, and a soft cap.

I informed Mr. Davis and Mr. Wilson that HBS could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. Both representatives stated that tail numbers of the planes in service were potentially CBI. Neither representative made a CBI claim on the information gathered during the inspection.

Site Description: I conducted an Internet search on December 12, 2014, and recorded the following information.

- Hawker Beechcraft Corporation is a world-leading manufacturer of business, special mission and trainer aircraft – designing, marketing and supporting aviation products and services for businesses, governments and individuals worldwide. The company's headquarters and major facilities are located in Wichita, Kansas. HBS operates 10 owned facilities in Chester, UK; Toluca and Monterrey, Mexico; and in the U.S. in Atlanta (PDK and FTY); Houston; Indianapolis; Tampa; Wichita; and Wilmington, Del. Collectively, the service centers employ 1,000 and process 300 aircraft per week.

- The HBS facility in Indianapolis has been serving the Ohio Valley and Mid-Atlantic regions since 1971. The new facility is three times the size of the previous one, providing space to accommodate significantly more aircraft.

- The new facility includes a 7,700-square-foot line service terminal operated by Signature Flight Support, a 47,300-square-foot maintenance hangar space and 23,000 square feet of customer areas, administrative offices and back shops.

- Hawker Beechcraft Services Inc. Products: Wholesales petroleum and petroleum products Postboosters, Aircraft internal fuel tanks, Aircraft fuel drop tanks, Aircraft propellant tanks, Aircraft hybrid fuel storage systems, Aircraft fuel management systems, Aircraft fuel tanks and systems, Fuels, Fuel Oils.

- In addition to focusing on maintenance, repair and modification of airframes, power plants, and avionics systems, the Indianapolis HBS facility offers world-class AOG (aircraft on ground) support. The new HBS service center also offers custom interior modification services, with paint capabilities.

Mr. Wilson stated that the facility is an aircraft service center that can manage any aircraft maintenance issue; there are normally 10 to 15 aircraft in the hanger on any given day.

Mr. Wilson stated that the facility has a less-than 90-day hazardous waste storage area, and generates used oil, waste fuel, paint related flammable liquids, and wastewater accumulated in 250 gallon totes.

We began the site tour; the touring party consisted of myself, Ms. Wilkes, and Mr. Wilson.

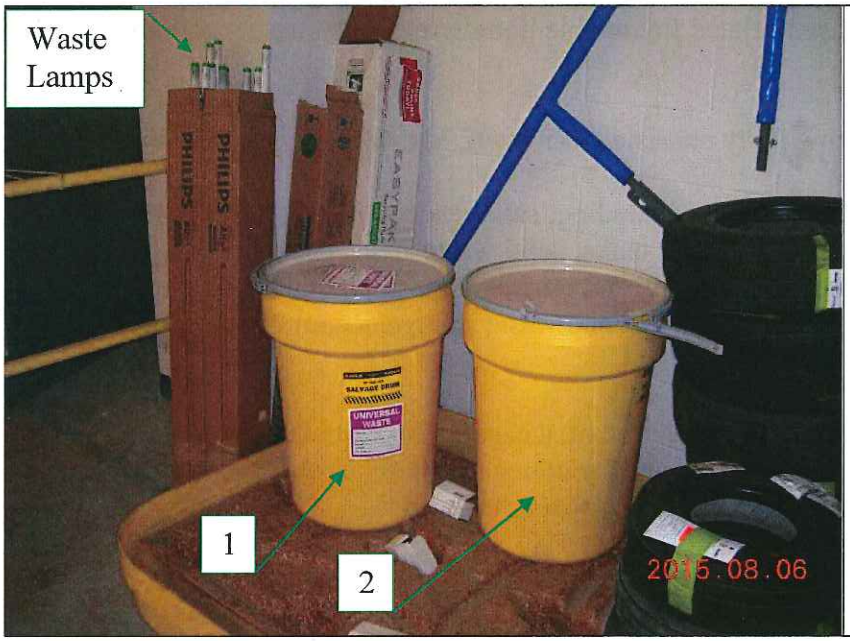
Site Tour: We observed facility operations including: satellite accumulation areas, the less-than 90-day accumulation containers and potential tanks, solid waste areas, product storage areas, used oil storage, universal waste accumulation, and emergency equipment. I took photographs of the various facility operations, waste operations, and waste storage/accumulation areas during the site tour. We moved to the Parts Department.

Parts Department: I observed, and took a picture of, a cage in the Parts Department (Picture 1). Mr. Wilson stated that this container held expired product and other wastes; I recorded that this cage met the conditions for a satellite accumulation area.

Picture #: 1 (DSCN 1268)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Parts Department
Subject: Cage for quarantined (i.e., waste) parts

We moved to the 2nd Floor.

2nd Floor: I observed, and took a picture of, containers in the facility's universal waste storage area (Picture 2).



Picture #: 2 (DSCN 1269)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: 2nd Floor
Subject: Universal waste containers

I recorded that container 1 in Picture 2 had a universal waste label, marked with words, "batteries" and the date, "11/2013." I moved the container and determined that the container held material.

I recorded that container 2 in Picture 2 had a universal waste label, and was marked with the words, "batteries" and the date, "11/2014." I moved the container and determined that the container held material.

I observed that there were containers in Picture 2 holding universal waste lamps, and the containers were not labeled or marked with the contents of the containers or an accumulation start date.

We moved back to the 1st Floor.

1st Floor: Upholstery Shop: I observed the presence of a spray booth. Mr. Wilson stated that workers use the booth to apply adhesives.

I observed, and took a picture of, a container with an, "Oily Waste Can" label (Picture 3). We opened the container and observed that the waste was not an oily waste. Mr. Wilson stated the material in the container was disposed of as a hazardous waste.

Picture #: 3 (DSCN 1270)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Upholstery Department
Subject: Container of hazardous waste

We moved to the NiCad Battery Room.

NiCad Battery Room: I did not observe any issues within this room. We moved to the Lead Acid Battery Room.

Lead Acid Battery Room: I observed the presence of one battery that Mr. Wilson stated will be disposed of at a later date. I observed that there was not an accumulation start date on or near the battery, but there was a tag with a tail number. Mr. Wilson stated that the facility can track the battery accumulation time using the tail number associated with the battery. We moved to the hanger.

Hanger: Mr. Davis joined us. I observed, and took a picture of, a spill response kit and a container with a non-hazardous waste label (Picture 4).

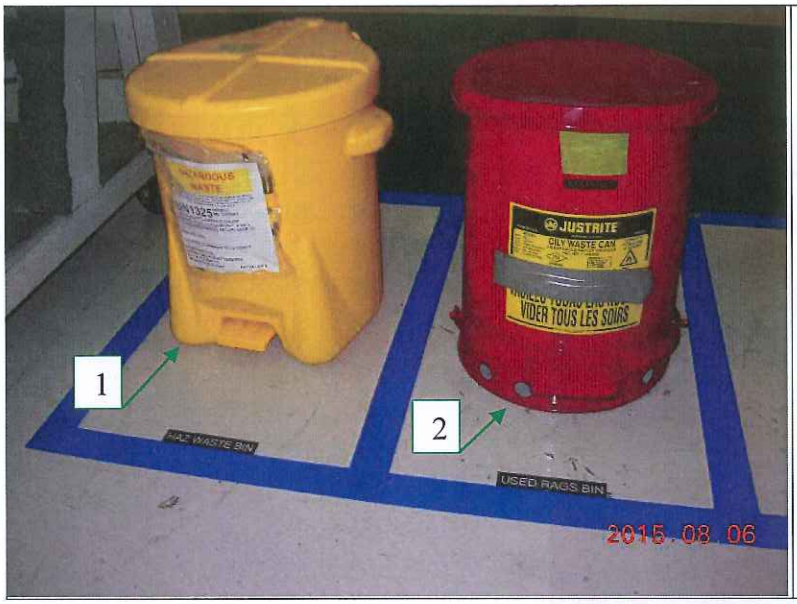
Picture #: 4 (DSCN 1271)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Hanger
Subject: Container of waste

We opened the container in Picture 4 that had the non-hazardous waste label, and I observed that it held used spill pads; the container was close to full. Mr. Wilson stated the pads contained used fuel, oil and alcohol.

I observed the presence of a cover in the floor. Mr. Wilson explained that there was a three-stage oil-water separator, part of the wastewater treatment system, and the cover was over the conveyance part of the system. I asked Mr. Wilson to open the cover, and I took a picture of the pit area under the cover (Picture 5).

Picture #: 5 (DSCN 1272)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Hanger
Subject: Pit under the floor

I observed, and took a picture of, containers with labels at the location Mr. Wilson identified as Work Station 3 (Picture 6).

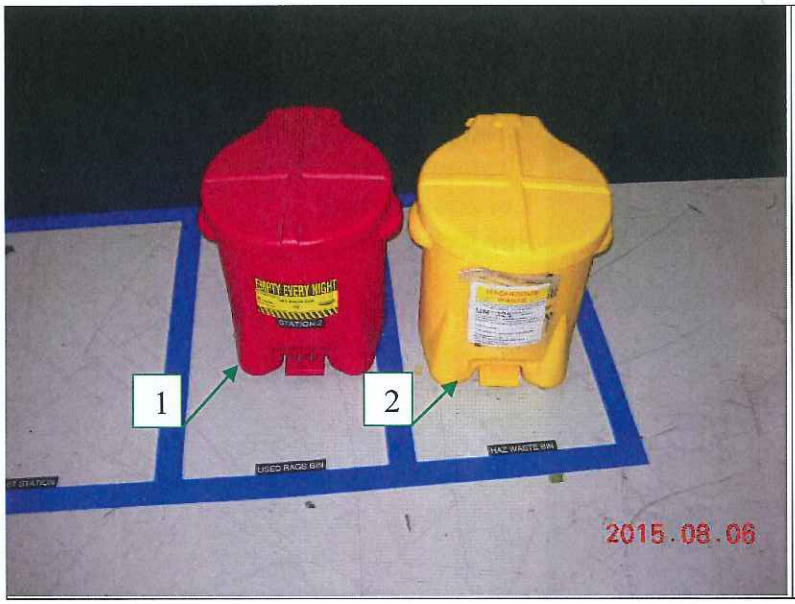


Picture #: 6 (DSCN 1273)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Hanger
Subject: Containers at Work Station 3

- Container 1 in Picture 6 had a hazardous waste label and was marked with the words, "Flammable Solid Debris" and "F005, D001, D035."

- Container 2 in Picture 6 was marked with the words, "Oily Waste Can."

I observed, and took a picture of, containers at the location Mr. Wilson described as Work Station 2 (Picture 7).



Picture #: 7 (DSCN 1274)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Hanger
Subject: Containers at Work Station 2

- Container 1 in Picture 7 was marked with the words, "Oily Waste Can."
- Container 2 in Picture 7 had a hazardous waste label and was marked with the words, "Flammable Solid Debris" and "F005, D001, D035."

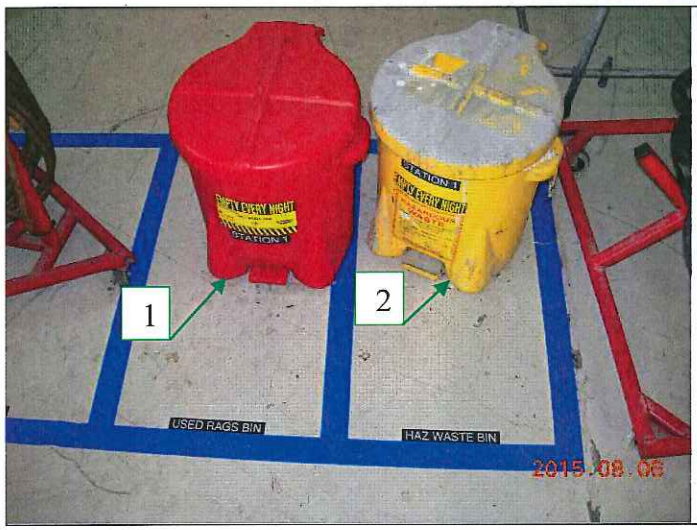
I observed, and took a picture of, the first two of four containers at the location Mr. Wilson described as Work Station 1 (Picture 8).

Picture #: 8 (DSCN 1275)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Hanger
Subject: Containers at Work Station 1

- Container 1 in Picture 8 was mot marked or labeled. When we opened the container, we discovered the presence of empty oil cans.

- Container 2 in Picture 8 had a non-hazardous waste label and was marked with the words, "Used Spill Pads."

I observed, and took a picture of, the second two of four containers at the location Mr. Wilson described as Work Station 1 (Picture 9).



Picture #: 9 (DSCN 1276)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Hanger
Subject: Containers at Work Station 1

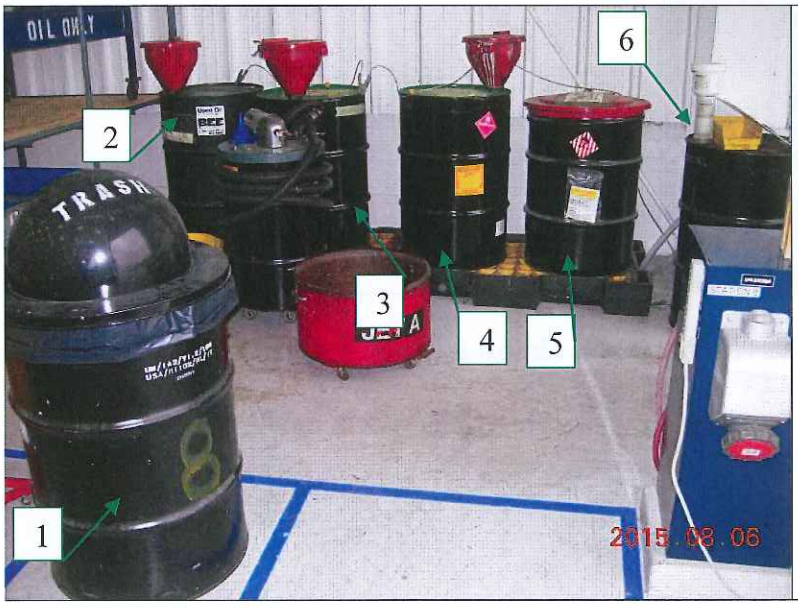
- Container 1 in Picture 9 was marked with the words, "Oily Waste Can."

- Container 2 in Picture 9 had a hazardous waste label and was marked with the words, "Flammable Solid Debris" and "F005, D001, D035."

I observed that the hanger floor was sloped and led to a series of trenches. I observed, and took a picture of, one of the trenches (Picture 10).

Picture #: 10 (DSCN 1277)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Hanger
Subject: Trench

I observed, and took a picture of, what Mr. Wilson described as a hazardous waste satellite container area by Station 8 (Picture 11).



Picture #: 11 (DSCN 1278)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Hanger
Subject: Containers near Work Station 8

I recorded the following information from the containers in Picture 11.

- Container 1 was marked with the word, "Trash."
- Container 2 was marked with the words, "Used Oil."
- Container 3 was marked with the words, "Waste Fuel."
- Container 4 had a hazardous waste label. Mr. Wilson stated the container was for liquids.
- Container 5 had a hazardous waste label. Mr. Wilson stated the container was for solids.
- Container 6 had a can puncture device, and a hazardous waste label.

I observed, and took a picture of, a container with a non-hazardous waste label (Picture 12).

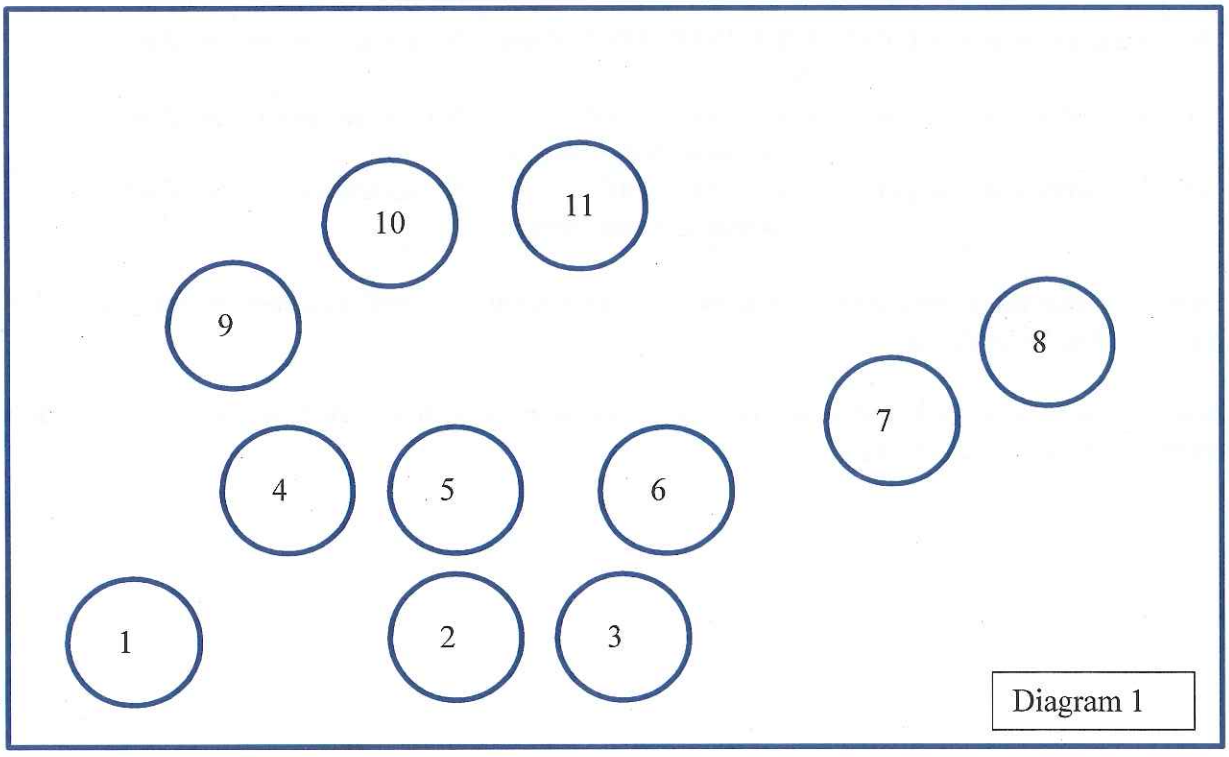
Picture #: 12 (DSCN 1279)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Hanger
Subject: Container

We opened the container, and I observed that is was almost full.

We moved to the less-than 90-day hazardous waste storage area within the hanger; I observed, and took a picture of, this area (Picture 13).

Picture #: 13 (DSCN 1280)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Hanger
Subject: Containers at Work Station 1

I diagramed, and recorded information from, the containers in this area (Diagram 1 of the containers in Picture 13).



#	Label Type	Markings	Accumulation start date and comments
1	Hazardous Waste Label	D001, F005, D035, Waste Paint Related Material	Missing accumulation start date
2	Hazardous Waste Label	D001, F005, D035, Waste Paint Related Material	Missing accumulation start date
3	Hazardous Waste Label	D001, F005, D035, Methyl Ethyl Ketone, Contaminated Debris	Missing accumulation start date
4	Non-hazardous waste label	Used Spill Pads	No comments
5	Non-hazardous waste label	Used Spill Pads	No comments
6	Hazardous Waste Label	D007, F005, Chromium	Missing accumulation start date
7	Hazardous Waste Label	F005, D001, D035, Flammable Solid Debris	Incomplete accumulation start date of 2-5
8	Hazardous Waste Label	D001, F005, Paint Waste	Accumulation start date of 5/2/15, approximately 96 days in storage at the time of the inspection
9	Hazardous Waste Label	F005, D001, D035, Paint Waste	No accumulation start date
10	Hazardous Waste Label	F005, D001, D035, Flammable Solid Debris	No accumulation start date
11	Hazardous Waste Label	F005, D001, D035, Flammable Solid Debris	No accumulation start date

I observed that there were three containers at work station 5, as well as a spill response kit. We moved to the Riser Room.

Riser Room: I observed, and took a picture of, a container with a hazardous waste label inside a compressor unit (Picture 14).

Picture #: 14 (DSCN 1281)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Riser Room
Subject: Container within a compressor unit

I observed the presence of a hole cut into the compressor unit in Picture 14. Mr. Wilson explained that the container was a satellite container of hazardous waste from the Paint Booth. I recorded that the hazardous waste label on the container in Picture 14 was marked with the accumulation start date of, "2-6."

I observed the Mixer Room located within the Riser Room. I did not observed any issues within the Mixer Room.

Mr. Wilson stated that the facility was equipped with a foam fire suppression system, and that the system is inspected annually.

We moved to the Paint Booth.

Paint Booth: I observed that the Paint Booth was large enough to hold a complete, intact airplane. I observed, and took a picture of, a container with a hazardous waste label (Picture 15).

Picture #: 15 (DSCN 1282)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Paint Booth
Subject: Container

I recorded that the container in Picture 15 had a hazardous waste label, and was marked with the words, "Waste Paint Related Materials" and "D001, F005."

I observed, and took a picture of, two containers that Mr. Wilson stated were satellite containers of hazardous waste (Picture 16).

Picture #: 16 (DSCN 1283)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Hanger
Subject: Containers

I recorded that Container 1 in Picture 16 was marked with the words, "Chromium" and "D007, F005"; and the accumulation start date of "1-5."

I recorded that Container 2 in Picture 16 was marked with the words, "Chromium" and "D007, F005"; and the accumulation start date of "1-6."

Mr. Wilson stated that the material in Containers 1 and 2 did not contain chromium; that the contents of both containers included flammable solids, paint contaminated products. Therefore, I recorded that while the facility used the correct hazardous waste label, the contents described on the labels were incorrect based on the actual contents of the containers.

I observed the presence of an eyewash station and fire extinguishers. We moved to the Tire Room.

Tire Room: I did not observe any issues within the Tire Room. We moved back to the Hanger, Station 4.

Hanger: We moved to Station 4. I did not observe any issues with Station 4. We left the main building and drove to Building 137.

Building 137: I observed that this building was also a hanger with offices. We entered the Maintenance Office. I did not observe any issues within the Maintenance Office. We moved to the Hanger. I observed, and took a picture of, a satellite hazardous waste container within the Hanger Area (Picture 16).

Picture #: 17 (DSCN 1284)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Container

I recorded that the container in Picture 17 had a hazardous waste label and was marked with the words, "MEK" and "D001, D035, F005."

I observed, and took a picture of, a container marked with the words, "Used Oil" (Picture 18).

Picture #: 18 (DSCN 1285)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Container

I observed, and took a picture of, a hazardous waste system that included trenches (Picture 19), and totes (Picture 20). I also observed a green / yellow dusting of material on the floor in Picture 19.

Picture #: 19 (DSCN 1286)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Trench

Picture #: 20 (DSCN 1287)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Totes

I observed, and took a picture of, the line in tote 1 in Picture 17 showing over 175 gallons of material. The hazardous waste label on tote 1 was not marked with an accumulation start date (Picture 18).

Picture #: 21 (DSCN 1288)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Tote 1

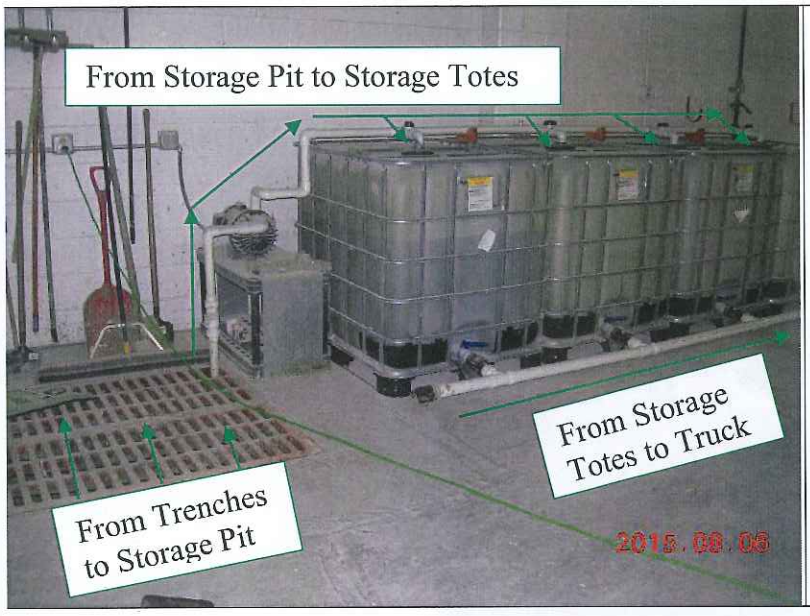
I observed, and took a picture of, a pit that was part of the trench to the tote system, and the material within the pit (Picture 22).

Picture #: 22 (DSCN 1289)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Pit and its contents

Mr. Price stated the pit was 4' x 4' x 4', with approximately 3" of material remaining in the pit after it was last pumped out. I calculated that 4' = 56"; 56" x 56" x 3" = 9,408 cubic inches. I found through research that 1 cubic inch = 0.004329 U.S. gallons. I calculated that 9,408 cubic inches x 0.004329 = 40.72 gallons. Therefore, there was approximately 40 gallons of hazardous waste within the pit at the time of the inspection. Mr. Price stated that the pit was never, "completely empty" and that the amount of material within the pit at the time of the inspection was normal. I observed that there was no hazardous waste markings or labels associated with the trenches, pit or the lines leading to and away from the totes. I observed that there was no overflow warning or prevention device associated with the pit. I observed that there was no accumulation start date associated with the pit. Mr. Wilson stated that there were no written inspection records for the pit, and he was unable to provide an accumulation start date record for the material in the pit.

Mr. Wilson stated the material in Tote 1 was in the tote for approximately two weeks from the time of the inspection.

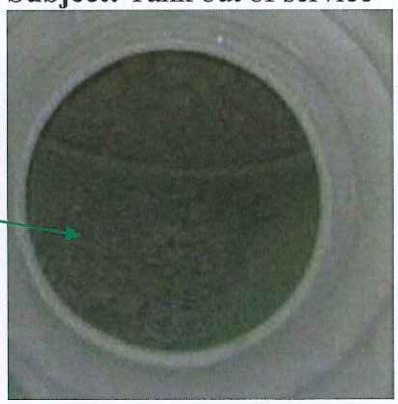
I took an overall photo of the tote system (Picture 23), and added a diagram of the hazardous waste flow to Picture 23.



Picture #: 23 (DSCN 1290)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Overall tote system

I observed, and took a picture of, a tank that Mr. Price described as an out of service hazardous waste storage tank (Picture 24). I noted the material still within the tank.

Picture #: 24 (DSCN 1291)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Tank out of service



Mr. Wilson stated that the facility did not inform IDEM of the tank closure. Ms. Wilkes confirmed that IDEM did not know of the tank closure activity.

I observed, and took a picture of, a container that did not have a label or marking describing its contents (Picture 25).

Picture #: 25 (DSCN 1292)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Container

We opened the container in Picture 25, and observed that the container was approximately 1/3rd full of what appeared to be paint chips. Mr. Wilson stated that the material in the container is normally handled by the facility as hazardous waste.

I observed, and took a picture of, a container with a hazardous waste label (Picture 26).

Picture #: 26 (DSCN 1293)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Container

I observed that the container in Picture 26 was overfull and could not close properly.

I observed, and took a picture of, a container with a hazardous waste label marked with the words, "Paint Chips" (Picture 27).

Picture #: 27 (DSCN 1294)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Container

I observed that the container in Picture 27 was not closed. Mr. Wilson stated the container could not be closed because of the materials had the potential to generate gas and explode.

We moved back to the main building to conduct the records review.

Records Review: The inspectors attempted to review waste profiles/characterizations, waste analysis records, manifests, land disposal restriction notifications (LDR), weekly container inspection logs, daily or weekly tank inspection logs, and the contingency plan. I completed a LQG checklist(s) during the records review, see Attachment A

Manifests: I reviewed, and recorded information from, the following manifests.

- Transporters
  - Heritage Transport LLC IND058484114
  - Bee Environmental Management IND000664131
  - EQ Environmental
- TSDFs
  - Heritage Environmental Services IND093219012
- Facility representative signatures: Donald Wilson, Nate Davis
- 2015 Manifests

000642927WAS	06/30/2015*	000664131WAS	02/16/2015
000684038WAS	01/24/2015	008305328JJK	02/19/2015
000659762WAS	01/09/2015	008305643JJK	01/20/2015
000659827WAS	01/20/2015		

* The last tanker truck shipment prior to the inspection from the tote storage system in Building 137. Note there was material remaining in Tote 1 and the Pit after this shipment for a minimum of 37 days at the time of the inspection.

- Non-hazardous Manifests for absorbent pads

02/19/2015	94826	6 DM	1,250 pounds
01/30/2015	94696	4 DM	700 pounds
01/27/2014	92497	5 DM	1,000 pounds
04/15/2014	92293	3 DM	825 pounds
07/14/2014	93449	6 DM 1 DF	1,500 pounds 250 pounds
09/19/2014	93897	7 DM	1,475 pounds

- 2014 Manifests

006137991JJK	09/19/2014	006137949JJK	07/14/2014
006137842JJK	01/23/2014	006137906JJK	04/15/2014
000638434WAS	10/22/2014	000616834WAS	08/20/2014
000611830WAS	05/13/2014	000565368WAS	01/20/2014

- 2013 manifests were available for inspection.

2014 Annual Hazardous Waste Report: I recorded the following from the report. The facility notified it was a LQG, and generated the following wastes.

D007, F005	Chromium	3,400 pounds
D001, D035, F005	MEK	4,144 pounds
D001, D035, F005	Waste Paint Related Material	2,000 pounds

Profiles: I reviewed the following profiles.

126936-1	Paint Chips (Paint booth filters, sand paper, sticky mats, dust, vac bags	D007	Chromium
126936-2	Methyl Ethyl Ketone Contaminated Debris	F005, D001, D035	MEK
126936-3	Paint Waste, Waste Paint Related Material	Did not record	Did not record
126936-4	Used Oil, from oil changes, preventative maintenance operations		

126936-5	Aircraft Paint Shop Waste (Pit waste), Aircraft paint stripping operations.	D007	Chromium

- Received a profile for the used drip pads designating the material as "absorbents and fuel." According to the profile, the used fuel within the absorbents had a 140° flashpoint. A solid waste must have have a flashpoint of less than 140° to secure the ignitability hazardous waste characteristic.

- Mr. Wilson was unable to provide a profile for any sludge generated from the oil / water separator; he stated the separator was in operation since 2009.

SPCC Plan: I reviewed the SPCC plan. The original plan was in place since April 2009, and was updated in February 2014. Mr. Wilson stated the plan was updated to include a hanger added since in 2009.

Emergency Procedures Manual: I reviewed the Emergency Procedures Manual, revision 6-23-2014, and recorded the following information.

- The plan addressed fires, fuel spills, and hazardous waste / hazardous material spills.

- The plan addressed the Airport Fire Department, the Wayne Township Fire Department, the Airport Police, and the Concentra Medical Center.

- The plan had an emergency coordinator listed who worked at the facility at the time of the inspection.

Hazardous Waste Contingency Plan (online): I reviewed the online Hazardous Waste Contingency Plan and recorded the following information.

- The plan addressed fires, explosions, and spills.

- The plan addressed the Indianapolis Airport Authority, fire department and police department.

- Each building has an alarm system.

- The facility has a public address system.

- The attachments to the plan did not apply to the facility (they were for a facility in another state).

- The plan did not include an equipment list with location and capability.

RCRA Training Program and Records: I reviewed and recorded the following information from the training program and supporting records.

- Nathan Davis: Attendant Line Service. Job summary and responsibilities did not include hazardous waste duties or initial and annual training requirements.

- Don Wilson: Building maintenance. Job summary and responsibilities did discuss hazardous waste duties and responsibilities, but did not discuss initial and annual training requirements.

- The facility claims to store its training records online. Mr. Wilson was unable to provide training records at the time of the inspection.

- The facility claims to store its training classes online. Mr. Wilson was unable to provide the training presentations at the time of the inspection.

- The course titles available in the facility's online training system are: Haz Com Haz Security and RCRA / DOT and Employee Emergency Action Plan.

Hazardous Waste Storage Tank: Mr. Wilson stated the tank was, "just removed." Mr. Wilson was unable to provide closure documentation or other tank records at the time of the inspection.

Less-than 90-day Hazardous Waste Storage Area Inspection Log: The facility maintained weekly inspections records for the storage area, and I recorded the following from the records.

- The waste in Building 137 was not included in the inspection.

- There was a written inspection checklist. However, the checklist did not include ensuring each container was marked with an accumulation start date. The checklist also was used to ensure no waste was in the area over 180 days, not 90 days.

LDRs: I recorded that all waste profiles had an attached LDR form.

Closing Conference: The closing conference was attended by myself, Ms. Wilkes, Mr. Davis, Mr. Wilson, and Mr. Andy Alberti, General Manager. We summarized the following issues identified during the inspection.

- Requirement for a hazardous waste determination for the material in the trench system heading for the oil / water separator, and any sludge generated by the system.

- The container in the less-than 90 day hazardous waste storage area that exceeded the 90-day storage limit.

- The lack of accumulation start dates on containers and, potentially, the totes and pit. Using full dates for accumulation start dates, and not dating containers when being placed for use at satellite accumulation points. Tote 1 was holding over 175 gallons of hazardous waste.

- Potentially exceeding 55 gallons at a satellite accumulation point.
- Updating the hazardous waste storage area checklist.
- The potential for the pit to be a hazardous waste storage tank as part of a tank system.
- The potential for the tote area to be a hazardous waste storage area. The pit was storing approximately 40 gallons of hazardous waste at the time of the inspection.
- Training record requirements for job descriptions and training.
- The closure of the hazardous waste tank should take place in accordance with a closure plan, and with IDEM concurrence.
- Universal was batteries in a container with an accumulation start date of 11/2013, an incomplete date and an indication of storage of over one year.
- Open containers of universal waste – waste bulbs, without accumulation start dates.
- A container of hazardous waste with a used oil label.
- Good bulbs not in containers, and therefore not protected.
- Over full container of hazardous waste in Building 137 without an accumulation start date and not closed.
- Unlabeled container of hazardous waste in Building 137.
- Green / yellow dust in hanger of Building 137.

I again mentioned that HBS could make claims of CBI on the material copied, photographs, and information gathered during the inspection. The facility representatives did not make any CBI claims. We moved back to Building 137.

Building 137: I observed, and took a picture of, a warning sign (Picture 28).

Picture #: 28 (DSCN 1296)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Warning Sign

I observed, and took a picture of, the yellow / green material on the floor of the hanger (Picture 29).

Picture #: 29 (DSCN 1296)
Date: August 6, 2015
Photographer: Dan Chachakis
Location: Building 137 Hanger
Subject: Yellow / Green material

The inspection concluded at approximately 4:45 PM.

Attachments

A. Checklist(s)

ATTACHMENT A
Checklist

U.S. EPA Generator Checklist for Indiana

7/27/2015 Hawker Beechcraft Services

PART 262: Standards Applicable to Generators of Hazardous Waste 08/06/2015

#	40 CFR	NA = Not Applicable, NI = Not Inspected, OK = In Compliance, DF = Deficiency	NA	NI	OK	DF
		GENERAL	**NA**	**NI**	**OK**	**DF**
1	262.11	Hazardous Waste Determination (characteristic, listed, TCLP, knowledge, exclusions)				X
2	262.12(a)	EPA Identification Number (Generator must have ID number)			X	
3	262.12(c)	Generator must not offer waste to transporters or facilities that have not received ID number.			X	
329 IAC 3.1-7/4-6 & 8 & 11		**THE MANIFEST**	**NA**	**NI**	**OK**	**DF**
4	262.20	General Requirements (manifest to approved TSD/alt. TSD, SQG reclaim exemption on file)(all required info)			X	
5	262.21	Manifest Acquisition (generator state 1st, consignment state 2nd)			X	
6	262.22	Number of Copies (generator, transporters, TSD, & 1 copy returned to generator)			X	
7	262.23	Manifest Use (signature & date: generator, transporter, TSD, keep copy)			X	
8	329 IAC 3.1-7-4	~~Indiana~~ Manifest required for hazardous waste shipped to Indiana TSD Facilities Universal			X	
9	329 IAC 3.1-7-6	Manifest copies available for review, submitted copies within 5 days after shipping			X	
		PRE-TRANSPORT REQUIREMENTS **NOTE:If facility treats in < 90 day tanks or containers, see 268.7**				
10	262.30, 31, 32, 33	Packaging, Labeling, Marking, Placarding (DOT regulations) (Only apply if waste is in the process of being transported) None being transported	X			
		LARGE QUANTITY GENERATORS	**NA**	**NI**	**OK**	**DF**
11	262.34(a)	90 Day accumulation limit: Generator may accumulate on-site for 90 days or less provided that:				X
12	262.34(a)(1)	Waste is placed in tanks, containers, containment building, or drip pad			X	
13	262.34(a)(2)	Container marked with start of accumulation date tote and Containers				X
14	262.34(a)(3)	Container/tank marked "Hazardous Waste" tank. pit				X
15	262.34(b)	30 Day extension	X			
		SATELLITE CONTAINERS	**NA**	**NI**	**OK**	**DF**
16	262.34(c)(1)	Satellite accumulation (55 gal. maximum or one (1) quart acutely hazardous)				X
17	262.34(c)(l)	i) Container must be closed when not in use, in good condition, and compatible with waste			X	
18	262.34(c)(l)	ii) marked "Hazardous waste" or other words, at or near process and under control of operator				X

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19	262.34(c)(2)	If exceed 55 gal., container must be marked with accumulation date and must be removed within 3 days				X
		SMALL QUANTITY GENERATOR	**NA**	**NI**	**OK**	**DF**
20	262.34(d)(e)(f)	SQG Requirements - 180 days or less (unless transported over 200 miles), quantity of hazardous waste on-site 6000 kg. or less, must follow:	X			
21	262.34(d)(4)	Containers marked with start of accumulation date and words "Hazardous Waste"	X			
22	262.34(d)(4)	Must also comply with 265 Subpart C and I. See pages 4 and 5.	X			
23	262.34(d)(5)	i) Emergency coordinator identified	X			
24	262.34(d)(5)	ii) Following info posted: emergency coordinator, emergency equipment location, phone numbers	X			
25	262.34(d)(5)	iii) Employees must be familiar with handling and emergency procedures	X			
26	262.34(d)(5)	iv) Respond to emergencies	X			
		RECORD KEEPING	**NA**	**NI**	**OK**	**DF**
27	262.40	RECORD KEEPING (3 yrs. for copy from manifests, TSD, biennial report, exception report, test results, waste analysis/determination, extension time for unresolved enforcement.) Missing ~~two~~ one determination	3*			X
28	262.41	Biennial Report (due March 1 even numbered years) (**LQG ONLY**)			X	
29	262.42	Exception Reporting (LQG: >35 days, if no return copy of manifest, contact TSD: >45 days report to IDEM, (SQG: >60 days) transportation report to IDEM)	X			
30	262.43	Additional Reporting , if required by Commissioner (concerning quantities and disposition of wastes in 40 CFR 261)	X			
31	262.44	SQG Recordkeeping Requirements (keep records for 3 years: manifests, exceptions, waste determination/analysis)	X			
		EXPORTS	**NA**	**NI**	**OK**	**DF**
32	262.52	General Requirements (notify EPA, accepted by receiving country, EPA consent)	X			
33	262.53	Notification of Intent to Export	X			
34	262.54	Special Manifest Requirements for Primary Exporters	X			
35	262.55	Exception Reports (>45 days from US departure, >90 days from receipt by foreign source/waste returned to US)	X			
36	262.56	Annual Reports (March 1 annually for waste: types, quantity, frequency, destination, waste reduction send to EPA)	X			
37	262.57	RECORD KEEPING (3 years for intent to export, EPA acknowledgments, confirmation of delivery, and annual reports)	X			
		IMPORTS OF HAZARDOUS WASTE	**NA**	**NI**	**OK**	**DF**
38	262.60	Hazardous Waste Imports (use consignment state's manifest)	X			

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		TSD STANDARDS APPLIABLE TO GENERATORS GENERAL FACILITY STANDARDS (NA for SQG)	NA	NI	OK	DF
39	262.34 / 265.16(a)	Personnel Training (Program Adequacy) Could not show training	X			X
40	262.34 / 265.16(b)	Personnel received training within six (6) months No records back to hire	X			X
41	262.34 / 265.16(c)	Personnel received annual review No records back to hire				X
42	262.34 / 265.16(d)	Training Documents: job titles, job description, type of training, training records Could be Note				X
		PREPAREDNESS AND PREVENTION	**NA**	**NI**	**OK**	**DF**
43	262.34 / 265.31	Maintenance & Facility Operation(must be maintained & operated to minimize possibility of release)			X	
44	262.34 / 265.32	Required Equipment (a. Internal alarm/communication system b. External/telephone communication c. Fire extingishers and spill control equipment d. water/foam)			X	
45	262.34 / 265.33	Testing & Maintenance of Equipment			X	
46	262.34 / 265.34	Communication & Alarm Access			X	
47	262.34 / 265.35	Required Aisle Space (to allow movement of spill control and emergency equipment and inspections)			X	
48	262.34 / 265.37	Local Authority Arrangements (police, fire, hospital)			X	
		CONTINGENCY PLAN & EMERGENCY PROCEDURES (NA for SQG)	**NA**	**NI**	**OK**	**DF**
49	262.34 / 265.51	Contingency Plan for Facility			X	
50	262.34 / 265.52	Contingency Plan Content (SPCC plan, local arrangements, emergency coordinator, equipment list, evacuation plan, etc.) Needs equipment list & location				X
51	262.34 / 265.53	Contingency Plan Available (on-site, local distribution) on-line			X	
52	262.34 / 265.54	Contingency Amendments (when regulations change, if plan fails, when facility makes changes)			X	
53	262.34 / 265.55	Emergency Coordinator available			X	
54	262.34 / 265.56	Emergency Procedures followed	X			
		USE & MANAGEMENT OF CONTAINERS	**NA**	**NI**	**OK**	**DF**
55	262.34 / 265.171	Container Condition (If not in good condition or leaking, must transfer waste or manage in some other way)			X	

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56	262.34 / 265.172	Waste Compatibility with Container			Y	
57	262.34 / 265.173	Container Management (closed/manged to prevent leaks)			Y	
58	262.34 / 265.174	Inspections (weekly) written records, needed/kept			X	
59	262.34 / 265.176	Ignitable/Reactive Waste (50 ft. set back)			Y	
60	262.34 / 265.177	Special Requirements for Incompatible Waste (physical separation/container compatibility)	Y			
		LAND DISPOSAL RESTRICTIONS	**NA**	**NI**	**OK**	**DF**
61	268.3	Dilution prohibited as substitute for adequate treatment			X	
62	268.7	Waste Analysis, Recordkeeping (LDR Notifications: waste code, whether it is a wastewater or non-wastewater, waste constituents to be monitored if monitoring will not include all regulated constituents, subcategory if applicable, and manifest number.) Need waste analysis for oil from sludge				X
63	268.7 (a)(4)	Treatment in 90-day tanks/containers requires waste analysis plan and testing frequency, filed with Regional Administrator (IDEM), certification of shipment, retained copies on-site (5 yrs.), notifications include: EPA ID #, treatment standards with 5 letter code, and manifest number	X			
64	268.7(a)(7)	Notifications must be kept on-site for five (5) years			X	
65	268.9	Listed and characteristic waste codes assigned for listed waste exhibiting characteristic			X	
66	268.42	Alternative treatment specified for lab packs, mixed waste: most stringent standards	X			
67	268.45	Treatment standards for hazardous debris	X			
		OTHER	**NA**	**NI**	**OK**	**DF**
68	IC 13-30	Release of contaminants to environment	X			
69	IAC 3.1-7-8	Facility has waste minimization program as certified on manifest			X	
70	IC 13-30-2-1 (9)	Does facility have any processes or activities (e.g. waste piles, incinerators, land disposal) which require a permit or interim status? If so, please identify below:	X			

1. Closed one H.W. Storage tank & removed tank. No notificatn to IDEM

2. Pit in 2nd hanger through which H.W. passes to totes.